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Attorneys for Creditors/Defendants:
SABIA FINANCIAL, INC., an Illinois corporation; FRANK DAL BELLO,
an individual; and CHAD ROTHROCK, an individual

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re:)	CHAPTER 11
)	
The Litigation Practice Group P.C.,)	Case No.: 8:23-bk-10571-SC
)	Adv. No: 8:25-ap-01122-SC
Debtor(s).)	
)	STIPULATION BETWEEN RICHARD A.
Richard A. Marshack, Trustee of the LPG)	MARSHACK, TRUSTEE OF THE LPG
Liquidation Trust,)	LIQUIDATION TRUST AND SABIA
)	FINANCIAL, INC., AN ILLINOIS
Plaintiff(s),)	CORPORATION TO WITHDRAW SABIA
)	FINANCIAL, INC., AN ILLINOIS
vs.)	CORPORATION'S PROOFS OF CLAIMS
)	
Sabia Financial, Inc., an Illinois corporation;)	
Frank Dal Bello, an individual; Chad)	Courtroom: 5C
Rothrock, an individual; and Trey Barnhart,)	411 W. Fourth Street
an individual,)	Santa Ana, CA 92701
)	Judge: Hon Scott C. Clarkson
Defendant(s).)	
)	

COME NOW, Plaintiff RICHARD A. MARSHACK, Trustee of the LPG Liquidation Trust
("Plaintiff"), on the one hand, and Defendant/Creditor SABIA FINANCIAL, INC., an Illinois
corporation ("Sabia" or "Defendant"), on the other hand, who hereby represent and stipulate as
follows:

RECITALS

A. Sabia filed a proof of claim on or about February 20, 2024, alleging that Debtor, The Litigation Practice Group P.C., owes Sabia an unsecured claim in the amount of \$1,690,419.14 as Claim No. 101403 (“February 20th Proof of Claim”).

B. Sabia filed another proof of claim on or about February 22, 2024, alleging that Debtor, The Litigation Practice Group P.C., owes Sabia an unsecured claim in the amount of \$1,690,419.14 as Claim No. 101850 (“February 22nd Proof of Claim” and collectively with February 20th Proof of Claim, “Proofs of Claims.”)

C. The instant Adversary Proceeding was commenced by the Plaintiff’s filing of its Complaint for: (1) Avoidance, Recovery, and Preservation of 2-Year Actual Fraudulent Transfers; (2) Avoidance, Recovery, and Preservation of 2-Year Constructive Fraudulent Transfers; (3) Avoidance, Recovery, and Preservation of 4-Year Actual Fraudulent Transfers; (4) Avoidance, Recovery, and Preservation of 4-Year Constructive Fraudulent Transfers; (5) Avoidance, Recovery, and Preservation of Preferential Transfers Made within Ninety Days of the Petition Date; (6) Aiding and Abetting; (7) Turnover; and (8) Disallowance of Claims (the “Complaint”) on March 12, 2025, which was Assigned Adversary Proceeding No. 8:25-ap-01122-SC against Sabia, and individual defendants Frank Dal Bello, Chad Rothrock and Trey Barnhart also known as Roy Barnhart III (collectively “Defendants”).

D. Plaintiff and Defendants have entered into a Settlement Agreement to resolve all causes action alleged in the Complaint (the “Settlement Agreement”). As a term of the Settlement Agreement, Sabia is required to withdraw its Proofs of Claims, which Sabia has agreed to do.

E. Since there is no Court Form available for Sabia to withdraw its Proofs of Claims, Sabia is requesting the withdrawal of its Proofs of Claims by way of this Stipulation and request for Order from the Court.

STIPULATION

NOW, THEREFORE, subject to approval of the United States Bankruptcy Court, it is hereby stipulated as follows:

1 1. All Recitals A through E above are an integral part of this Stipulation and are
2 incorporated as though fully set forth at this point.

3 2. Sabia desires to immediately withdraw its Proofs of Claims, in compliance with the
4 requirements of the Settlement Agreement.

5
6 Dated: July 30, 2025

DINSMORE & SHOHL LLP

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8 By: 

Sara A. Johnston, Esq.

9 Attorneys for Richard A. Marshack, Plaintiff and
10 Trustee of the LPG Liquidation Trust

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12
13 Dated: July 25, 2025

SILVER & ARSHT

14
15 By: /s/ Jeffrey A. Meinhardt

Samuel J. Arsht, Esq.

16 Jeffrey A. Meinhardt, Esq.

17 Attorneys for Creditors/Defendants

SABIA FINANCIAL, INC.; FRANK DAL

18 BELLO; and CHAD ROTHROCK
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